

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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VIRGIN ENTERPRISES LIMITED,

Plaintiff,

- against -

THOMAS FRANK, VIRGIN-INVESTMENT.COM,
N.C. SMOL, VIRGIN-AMERICA.COM, DIRECT
INFORMATION PVT LTD, VIRGINMACAU.COM,
C3 FINANCIAL SERVICES, INC.,
VIRGINMONEYUSA.COM, INTERNET EQUITY
INVESTORS, LLC, VIRGINPROPERTIES.COM,
1734488 ONTARIO INC., VIRGINPROPERTIES.NET,
QUENTRALL AIR CONDITIONING SERVICES, and
VIRGIN-PROPERTIES.COM,

Defendants.
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07 Civ. 6234 (LAP)

ECF CASE

DECLARATION OF DARCY M. GODDARD

DARCY M. GODDARD declares pursuant to 28 U.S.C. section 1746 as follows:

1. I am a member of the Bar of this Court and am associated with the firm Fried, Frank, Harris, Shriver & Jacobson LLP, attorneys for Plaintiff Virgin Enterprises Limited ("VEL") in this action. I make this Declaration in support of VEL's application for entry of default judgment against Defendant C3 Financial Services, Inc. ("C3 Financial").

2. This action was commenced on July 5, 2007, by the filing of a Complaint. A copy of the Complaint is attached as Exhibit 1.

3. On July 17, 2007, VEL filed an Amended Complaint. A copy of the Amended Complaint is attached as Exhibit 2.

4. The Summons and Amended Complaint were served on C3 Financial on August 10, 2007. Proof of service on C3 Financial was filed with the Court on August 10, 2007. A copy of the proof of service on C3 Financial is attached as Exhibit 3.

5. C3 Financial's Answer was due on or before August 30, 2007. C3 Financial has not answered the complaint, and the time for doing so has expired.

6. On September 5, 2007, VEL requested from the Clerk's Office a Certificate of Default for C3 Financial, which was signed by the Clerk's Office on September 5, 2007. A copy of the Clerk's Certificate of Default for C3 Financial is attached as Exhibit 4.

7. On information and belief C3 Financial is not an infant, in the military, or an incompetent person.

8. A copy of VEL's proposed order of default judgment as against C3 Financial is attached as Exhibit 5.

I, Darcy M. Goddard, declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: New York, New York
September 17, 2007

s/Darcy M. Goddard
Darcy M. Goddard